

Public Comment Received Regarding Land Records

Comments listed in order received | Comments appear bolded | Editorial notes and changes appear [bracketed]

Comment number:	1	Commenter:	Deborah Aylward
Organization:	Private Investigators Assoc. of VA	Title:	President

[Comments edited by JCOTS staff due to submission's length; every attempt has been made to include all specific comments regarding the draft legislation in question.]

[From page 9 of comments:]

Private security personnel rely on the use of complete SSNs (and other unique identifiers such as dates of birth, often found in proprietary databases; public records and documents (be they court, court-held or state and local agency maintained) that are traditionally open for public inspection. These records include divorce, traffic, other criminal and land records.

Bank account and credit card numbers help to locate assets and instances of financial fraud to include identity theft. Military service numbers and driver's license numbers are vital to the proper vetting of job applicants.

[From page 17 of comments:]

Members of PIAVA firmly believe that rushing to pass new (or re-enact) legislation without completely understanding of all the unintended and adverse consequences will result in risks to public safety, corporate and government security, and will impede citizens' pursuits of justice.

We respectfully recommend and request that all legislation before your committee proposing the redaction of identifiers on existing public records, the elimination or reduction of personal identifiers to just the serial number on new filings requires further and serious study. We further recommend and request that any Sunset provisions be extended.

Comment number:	2	Commenter:	Mike Stollenwerk
Organization:	Fairfax County Privacy Council	Title:	Chairman

[Comments edited by JCOTS staff due to submission's length; every attempt has been made to include all specific comments regarding the draft legislation in question.]

[From page 5 of comments:]

Fairfax County Privacy Council OPPOSES this proposal unless it is modified to prohibit the recording of any portion of a Social Security Number.

[NOTE: The 2004 General Assembly amended the statute to enable court clerks to reject documents with social security numbers. It placed the burden on the attorneys to ensure that they do not appear. To be consistent, this proposal would prohibit accepting the documents, but would still place the burden on the drafters and filers.]